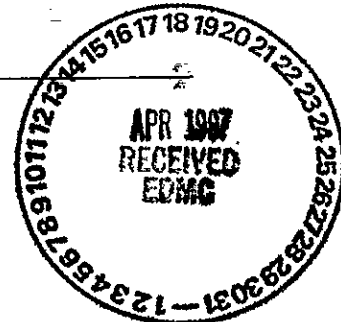


Author: Alisa D Huckaby at ~HANFORD02A
Date: 4/18/97 10:29 AM
Priority: Normal
TO: Debra A (Debbi) Isom at ~WHC156
Subject: 222-S Laboratory Complex Part A
----- Message Contents -----

Debbie,
Can this mail message be directed to the 222-S Laboratory Complex Administrative Record? If not, please let me know how to get this message in! In advance, thank you very much for your help!
Alisa

Forward Header

Subject: 222-S Laboratory Complex Part A
Author: Alisa D Huckaby at ~HANFORD02A
Date: 4/2/97 9:47 AM



Cliff,

Fenggang Ma and myself have been working with Joel Williams on the revised Part A for the 222-S Laboratory Complex for several months now.

Originally, the Part A was revised pursuant to WAC 173-303-805(7)(a)(iv). The revision was necessary to address an operator change.

During the on-going voluntary compliance action, it was necessary to also revise the Part A pursuant to WAC 173-303-805(7)(a)(iii). It should be noted the revision was necessitated by DOE's desire for the 219-S tank system to have the flexibility to accept off-unit waste. Therefore, the revision was necessary to address a process change. In particular, the 219-S tank system process was changed to accept off-unit waste.

The process change then required the boundary of the TSD unit to be changed. Ecology has concurred with all proposed changes associated with the TSD boundary change.

Also during discussions regarding the above described changes, there was discussion of acceptance of waste from off-site. In particular, the waste to be accepted from off-site was described as consisting of the return of unused portions of Hanford samples and the waste generated from analysis of Hanford samples.

Ecology verbally agreed that the off-site waste types were reasonable and that it would be acceptable to revise the Part A.

Revision 5 of the Part A was submitted on March 4, 1997. The revision did not define or delineate acceptable off-site waste types.

Subsequent to Ecology's verbal agreement, Ecology learned of improper waste management practices associated with the 219-S tank system. For example, laboratory wastes from the cleanout of the 1706 KE laboratory were incorrectly directed to the 219-S tank system. In

addition, the waste was accepted without adequate confirmation and/or verification. Due to the concern this new information has generated, Ecology cannot accept the language of the revised Part A as it is currently written as it does not delineate or define what wastes (unused portions of Hanford samples or wastes generated from the analysis of Hanford samples) may be accepted from off-site. It should also be noted that the written justification which explains the need for the revision as required by WAC 173-303-805(7) (a) (iii) has not been submitted to date.

In addition to the above identified concern, Ecology considers the 219-S tank system to be a "pass-through" waste management system whereby waste is stored and treated in the 219-S tank system only to "make the mixed waste more amenable for storage in the DST System". Therefore, as the 219-S tank system is a component of a "treatment train", I feel the acceptance of any other waste other than what has been verbally agreed to is beyond my decision-making level. To further explain, it is my opinion that the acceptance of non-laboratory waste into the 219-S tank system is synonymous to acceptance of non-laboratory waste into the DST tank system. Therefore, it is my opinion that it would be inappropriate for the 219-S tank system to accept "off-site" or non-Hanford waste while the DST tank system does not accept off-site waste. My opinion is logic-based and as such I have elected to use permit discretion. I do not desire to enter into a debate about a legal definition of "on-site".

I have discussed this logic and permit discretion with Fenggang Ma, Laura Cusack, and Moses Jaraysi. I have also discussed the policy implications with my upper management. It is agreed that if DOE will not define (on the Part A) what off-site waste is acceptable, the proposed revision will be rejected and the policy aspect of the decision will be forwarded to my management.

While there does not appear to be an approval clock associated with WAC 173-303-805(7) (a) (iii) for the approval of the Part A, Ecology is anxious to approve the Part A so that our attention may be directed to more important issues which are occurring in relation to the 222-S Laboratory Complex. I look forward to resolution of this issue prior to May 4. If we are unable to resolve this issue, Ecology will formally reject the revised Part A.

Sincerely,
Alisa Huckaby